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FEDERAL ELECTION
COMMISSION JUL 10 1997

ARLINGTON DEMOCRATIC JOINT CAMPAIGN
4620 Lee Highway, Suite 208
Arlington, VA 22207

JUL 7 12 11 PM '97

July 3, 1997

Jennifer K. Wall, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Wall

This letter is in response to yours dated May 28, 1997. Therein, you raised questions concerning information contained in the Arlington Democratic Joint Campaign's ("ADJC") 30 Day Post-General Report (10/17/96-11/25/96).

First, you note that the ADJC failed to check the "ratio type box" on its Schedule H2. This information has been supplied in an amended Schedule H2 (see attached).

Second, your letter notes that ADJC disclosed limited payments for administrative expenses and did not allocate any administrative expenses between federal and non-federal accounts for 1996. This same question was presented to ADJC in 1995, and we responded to the Commission on the subject. See Letter from D.Roberts to W.Barkley (Oct. 31, 1995). The explanation provided then remains relevant and is essentially restated below.

ADJC is a federal political committee. Although it is a subordinate committee to the Arlington County Democratic Committee ("ACDC"), ADJC does not regularly engage in or otherwise finance joint federal/non-federal activities with ACDC or any other non-federal committee/account. With the exception of the costs associated with printing and distributing one sample ballot each election cycle, ADJC engages solely in federal election activities and pays the full cost of such activities.

ADJC's administrative expenses are very minimal, because ADJC is an all-volunteer organization. Also, ADJC is dormant most of the election cycle, becoming active only in the last few months prior to the general election.

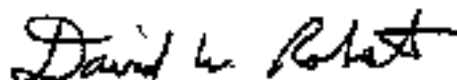
ADJC does, however, lease office space from ACDC for the period prior to the general election. Because many of ADJC's volunteers also are volunteers for ACDC, it is convenient for them to work out of ACDC's office space. Since ADJC's use of ACDC office space was to be for a limited period of time (approximately 3-4 months) and its use of the office space would vary from month to month, the two organizations agreed that ACDC

would bill ADJC for the entire amount of ACDC's office rent for that period, and, further, that ADJC would pay certain other administrative costs for ACDC (i.e., telephone and phone bank charges and newsletter printing costs). This arrangement was mutually beneficial. ADJC essentially received a short-term lease for office space at a convenient location, and ACDC found another organization to subsidize the entire cost of its rent and certain administrative costs during that period.

Accordingly, in November 1996, ACDC sent ADJC a bill for its office rent and the other administrative expenses for the August-October period. This amount came to \$10,874.83. The full amount was promptly paid by ADJC on December 4, 1996 (see 1996 Year End Report, Schedule B, line 21b).

We hope this letter and accompanying amendment are a satisfactory response to your letter. Should you have further questions concerning this matter, please do not hesitate to call.

Sincerely,



Dave Roberts
Treasurer

ALLOCATION RATIOS

NAME OF COMMITTEE

Arlington Democratic Joint Campaign

ALLOCATION RATIOS FOR INDIVIDUAL FUNDRAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT.

Methods of allocation:

- I. **FUNDRAISING** activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.
- II. **EXEMPT** activities are allocated using the "time and space method" where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.
- III. **Shared DIRECT CANDIDATE** support activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

NAME OF ACTIVITY OR EVENT SAMPLE BALLOT PREPARATION AND DISTRIBUTION ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input checked="" type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	FEDERAL % 50	NON-FEDERAL % 50
NAME OF ACTIVITY OR EVENT ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %
NAME OF ACTIVITY OR EVENT ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %
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ARLINGTON JOINT DEMOCRATIC COMMITTEE
4620 Lee Highway, Suite 208
Arlington, Virginia 22207

October 31, 1995

Ms. Wendy Barkley, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
OCT 31 12 35 PM '95

Dear Ms. Barkley:

We are in receipt of your letter of September 27, 1995, requesting additional information concerning the Arlington Democratic Joint Campaign's ("ADJC") 1995 Mid-Year Report. More specifically, your letter asks whether a January 19, 1995 disbursement to the Arlington County Democratic Committee in the amount of \$6,318.64 for "facility reimbursement" should have been treated as a shared allocable expense and paid subject to an appropriate allocation method reflected on a Schedule H1. In addition, your letter inquires about the absence of any disclosure of administrative expenses and generic voter drive costs. The following should be responsive to both of your questions.

ADJC was established and registered as a federal political committee in July 1994. It is a subordinate committee to the Arlington County Democratic Committee ("ACDC"), a local party organization. However, ADJC does not regularly engage in or otherwise finance joint federal/non-federal activities with ACDC. It engages solely in federal election activities, and it undertakes its activities alone, paying the full cost of its activities and not sharing the cost with ACDC.^{1/}

ADJC is not a year-round operation. Its level of activity increases as a federal general election draws near. At other times it is virtually dormant.

ADJC is an all-volunteer organization, so it has no employees and pays no salaries. Because many of its volunteers also volunteer for ACDC, it was convenient to work from ACDC's office. ADJC agreed to pay its fair share for the use of ACDC's office space and equipment and related expenses (utilities, office supplies, telephones, etc.). However, since the amount of

^{1/} Close to the general election, ADJC engaged in a joint federal-non-federal activity with ACDC, which involved the printing of a sample ballot. ADJC disclosed this activity by filing the requisite allocation forms.

time ADJC would utilize ACDC's office space and resources would vary from month to month and was not predictable in advance, it was determined that the amount charged to ADJC would vary accordingly -- dependent upon use.

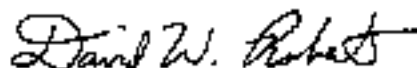
ADJC was virtually dormant during the summer of 1994. Consequently, it incurred very minimal expenses during this period. Because of ADJC's limited activity in the summer, no bill was sent for this period of time.

ADJC became increasingly active as the general election drew near, and it was accordingly billed for September, October and November 1994. A bill was sent in December 1994 and paid by ADJC in January 1995.^{2/} The amount paid by ADJC, \$6,318.64, reflects approximately 40% of ACDC's overall office/related expenses for that time. The amount charged was the result of a reasonable allocation of ACDC's rent and expenses for the period, based on an estimate of the amount of time spent by volunteers on ADJC activities. Since the November election, ADJC's level of activity has decreased, and it is now virtually dormant once again.

Since ADJC does not maintain a federal and non-federal account and because it does not ordinarily engage in joint federal/non-federal activities with ACDC, it did not appear necessary to file a Schedule H1.

We hope the aforementioned provides a satisfactory response to your request. Should you have any questions or require additional information, please do not hesitate to call.

Sincerely,



Dave Roberts
Treasurer

^{2/} This information was disclosed in ADJC's FEC reports and in a letter sent to Mr. Jordan Frame on March 31, 1995.

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.



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JS

PREPARED

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